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December 16, 2022

BY ECF

Honorable Judge Denise L. Cote
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

**Re: United States v. Frankie Centeno
22 Cr. 542 (DLC)**

Dear Judge Cote,

I write to request a one-week extension of the defense's pretrial motions deadline from December 9 to today, December 16, 2022. Pretrial motions were due Friday, December 9 with Government opposition due December 16. Due to my own error in miscalculating the motions deadline, I did not have sufficient time to prepare and discuss the motion with Mr. Centeno.¹ I apologize for the delay and ask the Court to consider the defense's single pretrial motion—a motion to dismiss the indictment—that has been filed today via ECF (Dkt# 15). A one-week extension would not result in a delay of the firm March 6, 2023 trial date. I understand that AUSA Lara Pomerantz begins trial in a separate matter on January 4. I would therefore ask that the Court extend the Government's deadline to respond until a date after Ms. Pomerantz completes her trial.

*The Government's
opposition is due
2/10/23.
Frankie Cote
12/21/22*

Respectfully submitted,

/s/
Zawadi Baharanyi
Assistant Federal Defender
Counsel for Frankie Centeno

cc: AUSA Lara Pomerantz

¹ The initial pretrial conference in this matter occurred on October 21, 2022. At that conference, the Court initially discussed setting defense motions for January 13, 2023 and Government responses for January 20.